

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|                                |   |   |
|--------------------------------|---|---|
| In re:                         | : | Chapter 11  |
|                                | : | Case No. 01-1139 (JKF)                              |
| W.R. GRACE & CO., <i>et al</i> | : | (Jointly Administered)                              |
|                                | : |   |
| Debtors.                       | : | <b>Objection deadline: May 7, 2004 at 4:00 p.m.</b> |
|                                | : | <b>Hearing date: May 24, 2004 at 12:00 p.m.</b>     |
|                                | : |   |
|                                | : | Related Doc. No. 5460                               |

**LIMITED OBJECTION OF CERTAIN INSURERS' TO DEBTORS' MOTION TO  
APPOINT A LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS CLAIMANTS**

Certain Insurers<sup>1</sup>, by and through their undersigned counsel, hereby submit this Limited Objection to Debtors' Application for the Appointment of a Legal Representative for Future Asbestos Claimants (the "Limited Objection") (Docket No. 5460). In support of their Limited Objection, Certain Insurers incorporate the brief filed simultaneously with this Limited Objection.

Dated: May 7, 2004

COZEN O'CONNOR

/s/ Shelley A. Kinsella

\_\_\_\_\_  
Shelley A. Kinsella (DE No. 4023)  
1201 N. Market Street, Suite 1400  
Wilmington, DE 19801  
(302) 295-2000 Telephone  
(302) 295-2013 Facsimile

- and -

[Signatures continued on next page]

---

<sup>1</sup> Certain Insurers are Federal Insurance Company and Royal & SunAlliance.

William P. Shelley (PA ID 40875)  
Jacob C. Cohn (PA ID 54139)  
1900 Market Street  
Philadelphia, PA 19103  
(215) 665-2000 Telephone  
(215) 665-2013 Facsimile

Attorneys for Federal Insurance Company

- and -

BIFFERATO, BIFFERATO & GENTILOTTI  
Ian Connor Bifferato (DE No. 3273)  
1308 Delaware Avenue  
The Buckner Building  
Wilmington, Delaware 19899-2165  
(302) 429-1900 Telephone

-and-

WILSON, ELSER, MOSKOWITZ, EDELMAN &  
DICKER, LLP  
Carl J. Pernicone  
150 East 42<sup>nd</sup> Street  
New York, New York 10017-5639  
(212) 490-3000 Telephone

Attorneys for Royal & SunAlliance